

Exhibit F

**List of Fifty (50) Civil Lawsuits Alleging
Police Falsified, Exaggerated, or Withheld
material evidence and conducted search or
arrests without probable cause.**

LIST OF 50 CIVIL LAWSUITS

1. *Hart v. City of New York*, 186 A.D.2d 398 (1st Dept. 1992): Damage award upheld against police officers who gave false grand jury and trial testimony.
2. *Tong v. City of New York, et al.*, 95-cv-7965 [S.D.N.Y., settled 10/4/95, \$35,000]: Plaintiff arrested for traffic violation, which was later dismissed. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional obligations of the NYPD, failure to train and supervise police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights.
3. *Dabbah v. City of New York, et al.*, 95-cv-2952 [S.D.N.Y., settled 3/12/96, \$35,000]: Plaintiff arrested without probable cause on disorderly conduct charges; charges dismissed on People's motion 8 months after arrest.
4. *Boland v. City of New York, et al.*, 93-cv-5058 [E.D.N.Y., settled 8/6/96, \$30,000]: Plaintiff arrested without probable cause; held in custody for two nights.
5. *Kadlub v. City of New York, et al.*, 95-cv-1080 [E.D.N.Y., settled 12/11/96, \$34,000]: Plaintiff arrested without probable cause on drug possession and sale charges. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional obligations of the NYPD, failure to train police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights.
6. *Castro v. City of New York, et al.*, 94-cv-5114 [S.D.N.Y., settled 3/18/97, \$72,500]: Plaintiff arrested on weapons possession charges without probable cause; charges dropped after plaintiff was held in custody for several hours. Complaint alleged that NYPD officer responded to plaintiff's complaints about wrongful arrest by saying that he would not release her, but if the arrest were in error she could "always sue the City, [because] they got a lot of money."
7. *McCaskill v. City of New York, et al.*, 96-cv-3687 [E.D.N.Y., settled 7/10/97, \$100,000]: Plaintiff arrested for disorderly conduct without probable cause; charges pending for approximately 6 months before dismissal by the court.
8. *Gurley v. City of New York, et al.*, 95-cv-2422 [E.D.N.Y., settled 8/21/97, \$1,7500,000]: Conviction obtained in 1972 was vacated over 20 years later based on prosecutor's withholding of exculpatory evidence, including an NYPD ballistics report. Complaint alleged that NYPD had longstanding policy of deliberate indifference to the constitutional requirement that exculpatory evidence be preserved and disclosed to defendants.
9. *Gaylock v. City of New York, et al.*, 96-cv-6183 [E.D.N.Y., settled 3/6/98, \$90,000]: Plaintiffs arrested without probable cause on weapons charges, which were pending for

10 months before dismissal by court. Complaint alleged *Monell* theory of liability based on the City's failure to train police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights.

10. *Gordon v. City of New York, et al.*, 97-cv-8035 [S.D.N.Y., settled 11/12/98, \$40,000]: Plaintiff arrested without probable cause based on false allegations in felony complaint made by NYPD officers; charges dismissed by prosecutor 3 months after arrest.
11. *Perez v. City of New York, et al.*, 98-cv-2331 [S.D.N.Y., settled 1/16/99, \$15,000]: Plaintiff arrested without probable cause; charges dismissed by court approximately 6 months after arrest.
12. *Zieheni v. City of New York, et al.*, 98-cv-3763 [S.D.N.Y., settled 3/5/99, \$55,000]: Plaintiff arrested without probable cause; charges pending for 2 ½ months before they were dismissed by the court. Complaint alleged arrest was made in retaliation for plaintiff's prior CCRB complaint.
13. *Deluise v. City of New York, et al.*, 98-cv-2551 [S.D.N.Y., settled 3/18/99, \$28,500]: Plaintiff arrested without probable cause.
14. *Napoli v. City of New York, et al.*, 97-cv-1255 [E.D.N.Y., settled 4/9/99, \$60,000]: Plaintiff arrested on weapons possession and assault charges based on false testimony by NYPD officers in grand jury. Plaintiff acquitted approximately one year after arrest. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional obligations of the NYPD, failure to train and supervise police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights.
15. *Jefferson v. City of New York, et al.*, 98-cv-1097 [E.D.N.Y., settled 4/14/99, \$175,000]: Plaintiff corrections officer arrested on drug charges without probable cause; charges pending for 5 months before grand jury returned no true bill. Complaint alleged that NYPD officers failed to inform prosecutors of their knowledge of plaintiff's innocence during the prosecution.
16. *Denizard v. City of New York, et al.*, 98-cv-423 [E.D.N.Y., settled 6/4/99, \$64,000]: Plaintiff arrested without probable cause for disorderly conduct, resisting arrest. Charges dismissed on People's motion eight months after arrest.
17. *Sweazie v. City of New York, et al.*, 99-cv-419 [E.D.N.Y., settled 10/20/99, \$20,000]: Plaintiff arrested on weapons possession charges; prosecution continued based on NYPD officers' false statements in felony complaint. Charges dismissed when grand jury voted no true bill. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional obligations of the NYPD, failure to train police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights; also alleged NYPD's institutional failure to follow up on civilian complaints made to IAB and CCRB.

18. *Daniels v. City of New York, et al.*, 00-cv-1981 [S.D.N.Y., settled 3/15/00, \$28,500]: Plaintiff arrested without probable cause on weapons charges; charges dismissed by the court 8 months after arrest.
19. *Almonte v. City of New York, et al.*, 99-cv-519 [E.D.N.Y., settled 7/12/00, \$30,000]: Plaintiff arrested on drug sale charges without probable cause; indictment dismissed by the court 1 year, 9 months after arrest. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional rights, failure to train police officers, and negligent hiring of officers, which caused plaintiff's malicious prosecution and unlawful arrest.
20. *Fields v. City of New York, et al.*, 99-cv-8130 [E.D.N.Y., settled 7/28/00, \$15,000]: Plaintiff arrested without probable cause; prosecution continued for four months before dismissal by court. Complaint alleged *Monell* theory of liability based on the City's failure to train police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights.
21. *Younger v. City of New York, et al.*, 00-cv-836 [S.D.N.Y., settled 9/1/00, \$25,000]: Plaintiff arrested without probable cause; complaint alleged that arrest was made in retaliation for plaintiff's complaint to IAB.
22. *Lovell v. City of New York, et al.*, 00-cv-0002 [S.D.N.Y., settled 10/20/00, \$40,000]: Plaintiff arrested without probable cause for turnstile jumping based on false statements made by NYPD officer in criminal complaint. Complaint alleged *Monell* theory of liability based on the City's deliberate indifference to constitutional obligations of the NYPD, failure to train police officers, and negligent hiring of officers, which caused violations of plaintiff's constitutional rights; also alleged NYPD's institutional failure to follow up on civilian complaints made to IAB and CCRB.
23. *Cotto v. City of New York, et al.*, 00-cv-1341 [E.D.N.Y., settled 12/01/00, \$30,000]: Plaintiff arrested without probable cause; charges pending for one month before dismissal by the court.
24. *Coleman v. City of New York, et al.*, 00-cv-2019 [E.D.N.Y., settled 1/2/01, \$60,000]: Two plaintiffs arrested without probable cause.
25. *Crespo v. City of New York, et al.*, 93-cv-8847 [S.D.N.Y., settled 8/29/06, \$25,000]: Plaintiff arrested without probable cause on weapons possession charges. Complaint alleged *Monell* claim based on the NYPD's "foster[ing of] a policy to which perjury and the falsification of documents were methods of securing indictments and convictions of innocent individuals."
26. *Gallo v. New York City Police Department*, 93 CV 2105 (E.D.N.Y.)(\$133,340);
27. *Gallion v. Detective Pereira, et al.*, 93 CV 5180 (S.D.N.Y.) (\$25,000);

28. *Lopez and Ravitz v. City of New York*, 93 CV 6516 (S.D.N.Y.) (\$80,000);
29. *Nakajima and Fancis v. Alamo Rent-a-Car, Inc., et al.*, 94 CV 0857 (E.D.N.Y.)(\$51,000);
30. *Nieves v. City of New York*, 94 CV 1491 (E.D.N.Y.)(\$50,000);
31. *Shabazz, et al. v. Detective Gerald Shisko, et al.*, 94 CV 0029 (E.D.N.Y.)(\$30,000);
32. *Agnew, et al. v. Bratton, et al.*, 94 CV 6508 (S.D.N.Y.) (\$90,000);
33. *Taousse v. City of New York*, 95 CV 7965 (S.D.N.Y.)(\$16,000);
34. *Mahase, et al. v. City of New York*, 96 CV 6105 (E.D.N.Y.) (\$75,000);
35. *Martinez v. City of New York*, 96 CV 0289 (E.D.N.Y.) (\$50,000);
36. *Tomback v. Dear, et al.*, 96 CV 3972 (E.D.N.Y.)(\$20,000);
37. *Frantino v. City of New York*, 96 CV 3725 (S.D.N.Y.) (\$50,000);
38. *Bradley v. P.O. Lisa Reale, et al.*, 97 CV 4076 (E.D.N.Y.)(\$20,000);
39. *Sierzputowski and Sulima v. City of New York*, 97 CV 2687 (E.D.N.Y.)(\$55,000);
40. *Silver v. City of New York, et al.*, 97 CV 5384 (E.D.N.Y.) (\$40,000);
41. *Gager v. City of New York*, 97 CV 4718 (S.D.N.Y.)(\$105,000);
42. *Bernard v. City of New York, et al.*, 98 CV 6068 (E.D.N.Y.)(\$36,000);
43. *Dennis v. Leak, et al.*, 98 CV 5355 (E.D.N.Y.)(\$15,000);
44. *Golston v. City of New York*, 98 CV 4206 (E.D.N.Y.)(\$25,000);
45. *Jefferson v. City of New York, et al.*, 98 CV 1097 (E.D.N.Y.) (\$175,000);
46. *Deluise v. City of New York, et al.*, 98 CV 4535 (S.D.N.Y.) (\$28,000);
47. *Lindo v. City of New York*, 98 CV 9066 (S.D.N.Y.)(\$80,000);
48. *Haygood, et al. V. City of New York, et al.*, 99 CV 0026 (S.D.N.Y.)(\$32,500);
49. *Udofia, et al. v. City of New York*, 00 CV 4872 (E.D.N.Y.) (\$30,000);
50. *Davis v. City of New York*, 00 CV 387 (S.D.N.Y.)(\$175,000);